

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In Re: MICHAEL DAVID BROOKS,

Debtor(s).

Case No. 13-31364-RLD13

OBJECTION TO CONFIRMATION AND MOTION TO  
DISMISS

The United States of America, a creditor herein, acting by and through its undersigned counsel, objects to confirmation of the debtor's plan and moves the court for an order dismissing this case, for the following reasons:

1. The Internal Revenue Service (IRS) has searched its records and found no record of the filing of certain returns, as follows:

Year/Period	Form/Type of Tax
2006; 2007; 2011; 2012	1040

2. All returns required for pre-petition periods must be filed prior to plan confirmation. The United States objects to confirmation of the plan until the required returns are filed, and for at least 30 days thereafter, so the IRS may properly determine the amount and status of any tax claims and whether the plan provides proper treatment.

Dated: 04/18/2013

/s/ Aimee R. Lobo-Berg  
AIMEE R. LOBO-BERG #036124  
Special Assistant U.S. Attorney  
620 S.W. Main, Room 312  
Portland, Oregon 97205  
Tel. No. (503) 415-8809

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN THAT the hearing on the above objection and motion will be held at the confirmation hearing scheduled by the court.

Dated: 04/18/13

/s/ Aimee R. Lobo-Berg  
AIMEE R. LOBO-BERG #036124  
Special Assistant U.S. Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing OBJECTION TO CONFIRMATION AND MOTION TO DISMISS was made on 04/18/2013, by mailing a true copy addressed to the following, except those designated as receiving ECF notice, who will be served electronically by ECF:

Michael David Brooks  
27120 SE Hwy 212  
Boring, OR 97009 Debtor(s).

George Hoselton, Attorney for Debtor(s)  
Wayne Godare, Trustee  
US Trustee, Portland

ECF Only  
ECF Only  
ECF Only

Dated: 04/18/2013

/s/ Aimee R. Lobo-Berg  
AIMEE R. LOBO-BERG #036124  
Special Assistant U.S. Attorney